



Henry Hultquist
Vice President
Federal Regulatory

AT&T Services Inc.
1120 20th Street, NW
Suite 1000
Washington, DC, 20036

T: 202.457.3821
F: 202.457.3072

October 30, 2015

VIA ELECTRONIC SUBMISSION

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW – Lobby Level
Washington, DC 20554

Re: **Sandwich Isles Communications, Inc., Petition for Declaratory Ruling (WC Docket No. 09-133)**

Dear Ms. Dortch:

On October 28, 2015, Bob Quinn, Keith Krom, and I, on behalf of AT&T, met with Amy Bender, Legal Advisor to Commissioner O’Rielly. We discussed the above-captioned proceeding and AT&T’s application for review of a 2010 *Declaratory Ruling* that allowed recovery of certain undersea cable lease payments from Sandwich Isles to an affiliate.

We urged the Commission to grant AT&T’s application. The *Declaratory Ruling* was based on certain “equitable considerations” that subsequent events have shown to be unfounded. Indeed, it appears that Sandwich Isles Communications has not even incurred the expenses allowed by the *Declaratory Ruling*,¹ and has instead incurred a variety of other expenses that are unrelated to the provision of basic services.² We believe that the Commission has prudently addressed the universal service aspects of this situation,³ and should now provide rate payers with relief.

Pursuant to section 1.1206 of the Commission’s rules, this letter is being filed electronically with your office for inclusion in the public record of the above referenced proceeding. If you have any questions or need additional information, please do not hesitate to contact me.

Sincerely,

Henry G. Hultquist

CC: Amy Bender

¹ Petition for Clarification and/or Declaratory Ruling, WC Docket 09-133 (February 6, 2015) at 5.

² See, e.g., Statement of Commissioner Ajit Pai, <https://www.fcc.gov/article/fcc-15-133a3>

³ *Id.*